III.   REMARKS

Claims 1, 8-10 and 13-22 are pending in this application. Claims 1, 8-10 and 13-22 are rejected under 35 USC 103(a) as being allegedly unpatentable over Matsuda et al., US 2002/0133573 ("Matsuda"), with Poger et al., US 6,772,420 B1 ("Poger"), providing intrinsic evidence for a device type being embedded in a MAC address, in view of Okano et al. US 2002/0062485 ("Okano"). Claims 2-7 and 11-12 were previously canceled. Applicant respectfully traverses the 35 USC 103(a) rejections for the reasons provided below.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

A. REJECTION OF CLAIMS 1, 8-10 and 13-22 UNDER 35 U.S.C. §103(a)

With regard to the 35 U.S.C. §103(a) rejections of claims 1, 8-10 and 13-22 over Matsuda with Poger providing intrinsic evidence, in view of Okano, Applicant asserts that the combined references cited by the Office fail to teach or suggest each and every feature of the claimed invention.

Claim 1 (and similarly claims 10, 14 and 19) recites, *inter alia*: "wherein the generating of a unique device identifier is automatically performed by the server or a unique device identifier is manually selected."

Applicant previously argued that Matsuda discloses an iterative process. In Matsuda, (1) client NOA suggests an IP address and name to server NOA; (2) server NOA acquires MAC address and retrieves previous name if it exists; (3) if previous name does not exist, a name is assigned; (4) server NOA then checks "not in use" field of DHCP table to see if selected name is in use; (5) if it is - the process reiterates; (6) server NOA determines if IP address is in use and continues modifying, checking and re-modifying as described in the previous paragraphs. [0065] ln.5-38. A review of this iterative process does not reveal an alternative between automatic or manual selection of a unique device identifier. Thus, Matsuda does not teach this feature of claim 1.

In response to Applicant's arguments, the Office states "Matsuda discloses the manual selection of a device identifier" citing paragraph [0065]. This assertion is without foundation. Matsuda states "NOA architecture automates these services." [0063]. The entirety of paragraph [0065] relates to how "NOA architecture automates these services." (Applicant continues to assert that Matsuda and Poger both fail to teach or suggest "generating a unique device identifier" and does not concede the Office's allegations in arguing that Matsuda fails to teach the recited feature: "wherein the generating of a unique device identifier is automatically performed by the server or a unique device identifier is manually selected.")

Further, claim 1 (and similarly claims 10, 14, and 19) recites, *inter alia*: "setting the device identifier status to indicate that the device identifier for the device entry is pending after communicating the device identifier."

The Office admits that Matsuda does not teach this feature. Office Action p.5. The Office cites Okano at paragraphs [0092] in support of its allegations. The Office

states in its "Response to Arguments" in support of this allegation that paragraph [0092] states "temporarily allocated." Office Action p.3. The phrase "temporarily allocated" does not teach or suggest this feature and fails to clarify how the cited paragraph teaches or suggests the feature.

Applicant asserts the Office's reasoning fails to explain its allegation that Okano teaches or suggests "setting the device identifier status to indicate that the device identifier for the device entry is pending after communicating the device identifier" and asserts that none of the cited references teach or suggest the feature.

Applicant submits that the combined references cited by the Office fail to teach or suggest each and every feature of claim 1 (and similarly claims 10, 14 and 19). Accordingly, Applicant respectfully requests that the Office withdraw its rejection.

With respect to the dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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